

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division**

<b>DARLA V. EDWARDS</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.: 5:23-cv-74</b>
	)	
<b>JAMES MADISON UNIVERSITY,</b>	)	
	)	
<b>and</b>	)	
	)	
<b>VIRGINIA ADVANCED STUDIES</b>	)	
<b>STRATEGIES, DBA “VIRGINIA</b>	)	
<b>EDUCATION STRATEGIES”</b>	)	
<b>(“VES”)</b>	)	
	)	
<b>and</b>	)	
	)	
<b>JENNIFER STEVENS,</b>	)	
	)	
<b>Defendants.</b>	)	

**REPLY IN SUPPORT OF  
MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

COMES NOW Plaintiff’s current Counsel, Tim Schulte and the law firm of Shelley, Cupp, Schulte, P.C. (collectively “SCS”) and in response to Plaintiff Darla V. Edwards’ Combined Reply to Response to Motion to Withdraw as Attorney (ECF No. 91), states as follows:

Plaintiff states that “continued representation by current counsel is ... untenable....” (ECF No. 91. p. 1). Plaintiff further “requests that this court grant her Motion for Leave to Withdraw Counsel....” *Id.* at p. 4, § 13. SCS agrees with Plaintiff’s assessment and request. The Plaintiff has terminated the representation; accordingly, the Court should grant leave for SCS to withdraw as

Plaintiff's counsel. *See Sines v. Kessler*, Civil Action No. 3:17-cv-00072, 2020 U.S. Dist. LEXIS 231918, at \*7 (W.D. Va. May 28, 2020) (reference to Court's earlier grant of motion for leave to withdraw following party's termination of representation); *see also Fifth Third Bank v. Metro Bus. Sys., LLC*, Civil Action No. 1:21-cv-832, 2022 U.S. Dist. LEXIS 239569, at \*2 (E.D. Va. Jan. 24, 2022).

Plaintiff makes representations in her Reply regarding the knowledge and conduct of SCS. SCS is presently constrained by Part 6, § II, Rule 1.6 of the Rule of the Supreme Court of Virginia, as well as by the confidentiality provisions of a certain mediation agreement, from making substantive statements regarding Plaintiff's representations to the Court and, therefore, cannot address those representations.

### **CONCLUSION**

For the reasons stated above, Counsel respectfully asks for leave to withdraw as Edwards' counsel.

Respectfully submitted,

/s/ Tim Schulte  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of June 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send a true and correct copy to all counsel of record.

And I hereby certify that I will mail by U.S. mail and email the document to the following:

Darla Edwards  
318 Walt Whitman Avenue  
Newport News, VA 23606

/s/ Tim Schulte  
Tim Schulte (VSB # 41881)